

**UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT  
OF WEST VIRGINIA**

**SCOTT T. BALLOCK**

Case No.: 1:17-CV-52

Plaintiff,

v.

**JURY TRIAL REQUESTED**

**ELLEN RUTH COSTLOW,  
STATE TROOPER MICHAEL KIEF,  
STATE TROOPER RONNIE M. GASKINS,  
And STATE TROOPER CHRIS BERRY,**

Defendants.

**PLAINTIFF'S EXPERT WITNESS DISCLOSURES**

The Plaintiff, Scott T. Ballock, hereby discloses the witnesses he anticipates will give opinion evidence in his case in chief at the trial of this action.

1. Dr. Clifford B. Hawley, Professor of Economics, WVU, in Morgantown, West Virginia. Copies of Dr. Hawley's report dated Monday, March 25, 2019 is attached, along with his curriculum vitae, standard fee schedule, invoice for this case, and a history of depositions and court appearances between 2011 and 2018, are all being produced with this disclosure.

Discovery closes June 7, 2019. As indicated in Dr. Hawley's report, additional data may come to hand that could warrant additions to the report. Subject to the applicable rules, orders of the Court and arrangements among counsel, the report

may be updated. Upon reasonable notice, Dr. Hawley will be available for a deposition, at the expense of the party requesting it.

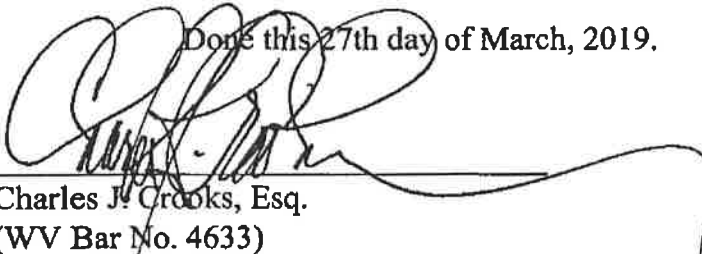
2. There have been several healthcare providers identified in discovery who examined and or treated Scott Ballock, Ellen Costlow and their children at various relevant times. A signed consent has been provided and defense counsel has been collecting records.

According to LR Civ P, Rule 26.01 (b):

The disclosures described in Fed. R. Civ. P. 26(a)(2)(B) shall not be required of witnesses who have not been specially retained or employed by a party to give expert testimony in the case, including physicians and other medical providers who examined or treated a party or party's decedent unless the examination was for the sole purpose of providing expert testimony in the case, or one whose duties as the party's employee regularly involve giving expert testimony.

There are no physicians or other medical providers who may give evidence who are known to Plaintiff or his counsel who would require submission of a disclosure described in Fed. R. Civ. P. 26(a)(2)(B).

Done this 27th day of March, 2019.



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*Counsel for Defendant, Scott T. Ballock*

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**CERTIFICATE OF SERVICE**

I, Charles J. Crooks, Esq., local counsel for the Plaintiff, Scott T. Ballock, hereby  
certify that on March 27, 2019, I served complete copies of the foregoing "Plaintiff's  
Expert Witness Disclosures" by email and U.S. postal delivery to the following:

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***Co-counsel for Defendants State Trooper  
Michael Kief, State Trooper Ronnie M.  
Gaskins and State Trooper Chris Berry***

I further certify that I electronically filed and served this certificate of service via  
the ECF system.

*Charles J. Crooks*

/S/ Charles J. Crooks, Esq.